

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 19-cr-10345-DPW
)	
ANNE M. LYNCH,)	
Defendants)	

DEFENDANT’S UNOPPOSED MOTION FOR PERMISSION TO TRAVEL

Defendant Anne M. Lynch, by and through undersigned counsel, hereby moves this Honorable Court to grant her permission to travel to the State of Florida from March 3, 2020 through March 24, 2020 to visit with family and friends. In support of this Motion, defendant states, by and through undersigned counsel, the following:

1. Defendant was arrested and appeared for her initial appearance on August 21, 2019.
2. On August 21, 2019, defendant was released on an unsecured bond of \$25,000.00 with multiple conditions of pre-trial release, including restricting travel to the six New England States (VT, ME, NH, MA, RI, CT) and New York unless otherwise permitted by the Court. To date, defendant has fully complied with all of her conditions of release.
3. On September 12, 2019, an Indictment was filed against her charging her with, *inter alia*, a racketeering conspiracy in violation of 18 U.S.C. § 1962(d), racketeering in violation of 18 U.S.C. § 1962(c), conspiracy to commit honest services wire fraud in violation of 18 U.S.C. § 1349, and honest services wire fraud in violation of 18 U.S.C. § 1343 and 1346. On September 23, 2019, defendant was arraigned and

released on the same conditions of pre-trial release. To date, defendant has fully complied with all of her conditions of release.

4. Defendant now moves for permission to travel to the State of Florida to visit with friends and family during the month of March. In the event this Court grants her request, defendant plans to fly from Boston to Orlando, Florida the week of March 3rd and fly home from Orlando, Florida the week of March 24th.
5. Defendant has provided US Probation Officer April Nichols with an itinerary detailing where she will be staying and with whom she will be staying each night including the names, addresses and phone numbers where she can be reached at all times.
6. Finally, undersigned counsel has conferred with the government and with US Probation and neither objects to this travel request.

WHEREFORE, defendant respectfully requests this Honorable Court to grant this motion and permit her to travel to the State of Florida between March 3, 2020 and March 24, 2020.

Respectfully submitted,
For the Defendant,
Anne E. Lynch
By his attorneys:

/s/ Scott P. Lopez
Scott P. Lopez, BBO # 549556
LAWSON & WEITZEN, LLP
88 Black Falcon Ave, Suite 345
Boston, MA 02210
617-439-4990 (tel.)
617-439-3987 (fax)
splopez@lawson-weitzen.com

Dated: February 4, 2020

CERTIFICATE PURSUANT TO LOCAL RULE 7.1

The undersigned counsel for Anne E. Lynch hereby certifies that he conferred with AUSA Kristina Barclay in person on January 16, 2020 and by electronic mail yesterday and today in a good faith attempt to resolve or narrow the issues raised in this motion and the government has no objection to the Court granting this motion.

/s/ Scott P. Lopez
Scott P. Lopez

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on February 4, 2020.

/s/ Scott P. Lopez
Scott P. Lopez